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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

**DECLARATION OF BRITTANY BRANDON
IN SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S
OPPOSITION TO PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Hearing Date: October 27, 2025
Time: 8:30 a.m.
Place: Courtroom 6, 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: August 10, 2026

Attachments: Exhibits A-D

1 I, BRITTANY BRANDON, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 2. I work with the Department of Public Works in the BSES division. I am the Supervisor
5 of the city wide Neighborhood Streets Team ("NST"). I also supervise the HSOC resolutions. I have
6 worked for the City and County of San Francisco, in the Department of Public Works since June 2012
7 when I started as a Public Service Aid. I have been promoted over the years to General Laborer
8 Apprentice, General Laborer, General Laborer supervisor, and now to the title of Street Environmental
9 Services Operation Supervisor.

10 3. The NST program began in March 2025. The goal of the NST is to operate city wide to
11 respond to complaints regarding unhoused encampments. The NST teams operate every day on city
12 streets from 7 a.m. to 4 p.m. There are 18 laborers and 2 supervisors dedicated to NST and on a daily
13 basis.

14 4. The NST teams operate independently and in addition to the remainder of DPW street
15 and sidewalk cleaning teams that comprise of the Zone crew, street sweeping, etc.

16 5. The NST teams operate seven (7) days per week. DPW NST employees meet at the
17 DPW yard at 2323 Cesar Chavez every morning at 7 a.m. The NST teams are divided into three
18 smaller teams, one for the Tenderloin/Northern neighborhood, one for the Mission Neighborhood, and
19 one for the rest of the City. Each NST team then travels to meet SFPD officers dedicated to this
20 program. DPW and SFPD meet at 1145 Market Street at 8:15 a.m. to identify and respond to their
21 locations for service. Each NST team consists of approximately 3 to 4 DPW employees and 2 SFPD
22 officers.

23 6. The NST teams in the Tenderloin identify the locations for their response by SFPD's
24 review and assessment of 311 complaints, Captain complaints, or other known areas of complaints. I
25 am informed and believe that Lieutenant Wayman Young leads the NST teams for SFPD.

26 7. Attached hereto as **Exhibit A** is a true and correct copy of the NST plan that was
27 implemented in March 2025 and is in place and currently used.

1 8. When the NST teams arrive to a location, SFPD officers handle the interaction with
2 unhoused persons, asking that persons move and/or remove their tents and belongings. SFPD assist
3 with the transportation of unhoused persons if they accept offered shelter or do not otherwise choose
4 to leave of their own volition. Thereafter, a thorough cleaning of the area begins, including removing
5 trash, “bagging and tagging” property to be stored if necessary, and then washing the areas with soap
6 and water.

7 9. The NST teams are able to respond to two to four sites or complaints per day. Every
8 location or complaint addressed is logged in a tracking system known as CMMS. Notes regarding the
9 work performed are recorded in the CMMS system. A CMMS entry is created when the DPW and
10 SFPD team arrive at the location and confirm the conditions to cure still exist. Before and after
11 photographs are also taken and recorded. Each NST team has a tablet to record and log their response
12 into CMMS.

13 10. Attached hereto as **Exhibit B** is a true and correct copy of a sampling of CMMS reports
14 of NST responses.

15 11. Weekly reports are prepared for the locations that NST responds to each week and what
16 work was performed. Tonnage of trash is recorded, the locations are recorded, the number of “bag and
17 tag” procedures are recorded, training is recorded, etc.

18 12. Attached hereto as **Exhibit C** is a true and correct copy of a sampling of weekly reports
19 prepared to summarize the NST weekly work.

20 13. If the NST team responds to a condition that involves an unhoused person unable or
21 unwilling to move their possessions, the DPW NST team follows the “bag and tag” policy to remove
22 and store the property. Attached hereto as **Exhibit D** is a true and correct copy of DPW’s “bag and
23 tag” policy.

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1 12. It is my belief and understanding that the NST program will continue and even grow as
2 it has proven to be an effective way to respond to complaints of encampments throughout the City.

3 I declare under penalty of perjury under the laws of the United States and the State of
4 California that the foregoing is true and correct.

5 Executed on September 18, 2025, at San Francisco, California.

6
7 /s/  9/18/25
8 Brittany Brandon
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